

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

REVLON CONSUMER PRODUCTS LLC and
ELIZABETH ARDEN, INC.

Plaintiffs,

-against-

GIVE BACK BEAUTY S.A., et al.,

Defendants.

Case No. 1:24-cv-06438-ER-RWL

I, Reid Mulvihill, under penalty of perjury, hereby declare as follows:

1. I am over the age of 18 years of age and competent to testify. I submit this Declaration in support of Defendants' Opposition to Plaintiffs' Motion for a Preliminary Injunction and Defendants' Opposition to Plaintiffs' Motion for Expedited Discovery. I have personal knowledge of the subject matter set forth herein.

2. In August 2014, I joined Elizabeth Arden as a fragrance coordinator. In September 2016, Elizabeth Arden was acquired by Revlon, and I began working for Revlon as a coordinator of Global Fragrance Marketing. At no time during my tenure at Revlon did I have any responsibility for or work on the Britney Brands account.

3. On March 11, 2024, I received a LinkedIn message from a recruiting firm, True Search, asking if I would be interested in exploring other job opportunities. After I told them I would be, they sent me a non-disclosure agreement ("NDA") and revealed that the company that was interested in meeting with me was Give Back Beauty ("GBB").

4. On March 21, 2024, I was interviewed by several GBB executives, and had several additional interviews on March 29, 2024 and May 6, 2024.

5. I received an offer letter from GBB on May 17, 2024, which I accepted on May 20, 2024.

6. On May 20, 2024, I also tendered my resignation to Revlon and continued to perform my responsibilities at the company until I left on May 31, 2024. In order to perform those responsibilities, I continued to access Revlon documents on my laptop.

7. At no time before I signed my offer letter from GBB did I discuss with Vanessa, Ashley, or Dominick that I was interviewing with the company. I only was informed that Vanessa Kidd went to work at GBB just before receiving my offer letter. I formally learned that Ashley Fass went to GBB only after she left Revlon, and I learned that Dominick Romeo left Revlon to go to GBB when I saw him there on the first day of work.

8. I was not involved in the negotiations between GBB and Britney Brands. I was unaware of the deal until after I had left Revlon.

9. On June 10, 2024, I joined GBB as Vice President Marketing – Fragrance, where my responsibilities include managing the lifestyle apparel brands of [REDACTED] and, then later on [REDACTED]
[REDACTED]

10. At GBB, I am not involved in business development pitches for any celebrities or brands that are or have been a part of Revlon's portfolio. I have never worked on any Britney Brands matters while employed at GBB.

11. While I worked at Revlon, I sometimes used the company computer to access my personal Gmail account but did not send or receive any proprietary Revlon information from that account.

12. I understand that Revlon conducted a forensic examination of my Revlon computer and determined that on May 22, 2024, I accessed a file called "Master File – Fragrance." While I

do not recall accessing the file on that particular date, it would not surprise if I did. The file in question contained a list of all of my company passwords, including passwords for my personal accounts at Revlon as well as passwords for work related accounts, Mintel and Euromonitor.

13. At no point while working at Revlon did I ever recall using a personal laptop to access Revlon files.

14. I did not download, transfer, print, copy, or take any documents containing any Revlon trade secrets or confidential information with me when I left Revlon, and no one at GBB has ever asked me to disclose any trade secrets or confidential Revlon information to them.

15. I have gained substantial knowledge about the fragrance industry, which I use in my job at GBB. But at no time have I ever used any of Revlon's trade secrets or confidential information to perform my job at GBB.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct and that this Declaration is executed in New York, New York on this 20th day of September 2024.

Signed by:
By: 
Reid Mulvihill
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